

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHARLENE TALARICO, individually and on behalf
of a class of all others similarly situated;

1:18-CV-00909-JPO

Plaintiffs,

**DECLARATION OF
THE RECORD**

—against—

THE PORT AUTHORITY OF NEW YORK AND
NEW JERSEY,

Defendant.

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I, Sandy Milord, Esq., certify, under penalty of perjury, that the following is true and accurate:

1. Attached as Exhibit “A” is a true copy of Plaintiff’s Notice of Claim served upon the Port Authority on November 30, 2017.
2. Attached as Exhibit “B” is true copy of Plaintiff’s Complaint, dated February 1, 2018.
3. Attached as Exhibit “C” is a true copy of Defendants’ Answer to the Plaintiff’s Complaint dated February 26, 2019.
4. Attached as Exhibit “D” are relevant excerpts from Plaintiff, Charlene Talarico’s, deposition transcript dated August 14, 2020.
5. Attached as Exhibit “E” are relevant excerpts from Dr. Pascale Kerlegrand’s deposition transcript dated October 19, 2020.
6. Attached as Exhibit “F” are relevant excerpts from Joseph Panio’s deposition transcript dated October 20, 2020.
7. Attached as Exhibit “G” is video surveillance footage of

Plaintiff dated stamped as August 4, 2016.

Dated: May 3, 2021

PORT AUTHORITY LAW DEPARTMENT
Attorney for Defendants

By: /s/ Sandy Milord
Sandy Milord, Esq.
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